

**RESPONSE TO USEPA MARCH 4, 2015 COMMENTS ON THE JANUARY 30, 2015
REVISED DRAFT AREA-WIDE NON-PCB CONSTITUENT SCREENING EVALUATION**

GENERAL COMMENTS

Commenting Organization: USEPA
General Comment #: 1

Commenter: Keiser

In general the supporting statements and conclusions developed within the document should be clarified and strengthened. See the specific comments below.

Response: The document was revised to add clarifying and supporting statements. Specific comments addressed as described below.

Commenting Organization: USEPA
Section: 2
Specific Comment #: 1

Page #: 2-4

Commenter: Keiser
Lines #: NA

Last sentence section 2.2.2.1, this statement could be stronger, the concentrations appear to be the result of sampling and laboratory artifacts.

Response: Sentence revised in Sections 1.1, 2.2.2.1, and 3.2.2.1. New sentence reads as “the high rate of estimated and/or biased data for these field sampling and laboratory artifacts are an indication of sample bias”.

Commenting Organization: USEPA
Section: 2.2.3
Specific Comment #: 2

Page #: 2-7

Commenter: Keiser
Lines #: NA

Modify the last line, "... qualified as secondary because the UCL and mean used to calculate the HQs have a higher degree of uncertainty, given the biased sampling design and the conservative Tier 2 screening criteria used."

Response: Statement revised as requested in Section 2.2.3 and in Section 3.2.3.

Commenting Organization: USEPA
Section: 2
Specific Comment #: 3

Page #: 2-18, 3rd bullet

Commenter: Keiser
Lines #: NA

Second sentence "...and some samples were filtered to focus on the finer-grained particles in the sample" Clarify, fine grained soil intervals were preferentially selected for analysis from the individual cores rather than course grained intervals?

Response: Clarification added to Page 1-4 as follows: "Samples were collected along riverbanks, with fine-grained sediments targeted. For example, approximately 20 percent of the sediments in Area 1 are fine-grained; however, the biased sampling conducted in 2000 resulted in nearly 60 percent of core locations being sampled in fine-grained sediment locations (ARCADIS 2012)."

On Page 2-18, the following paragraph appears - "Soil sampling strategies have been intentionally biased. Many samples were taken in areas of former impoundments or along the bank, and samples were focused on areas where finer-grained particles were more prevalent than coarser-grained particles. Visual observation of gray material resulted in preferential sampling of this layer rather than sampling a standard exposure interval. This approach likely overestimates the magnitude of Site soil concentrations and influences the results of hypothesis testing."

Commenting Organization: USEPA
Section: 2.4.1
Specific Comment #: 4

Page 0: 2-19

Commenter: Keiser
Lines #: NA

"2, 4 Dimethylphenol and pentachlorophenol were detected in 1 of 59 and 3 of 59 paper residual samples, respectively. This discussion should be moved to Section 2.4.2 Uncertainties with Excluding Constituents with a Low Frequency of Detection"

Response: Text moved as requested.

Commenting Organization: USEPA
Section: 3.2.3
Specific Comment #: 5

Page #: 3-7

Commenter: Keiser
Lines #: NA

Middle of the paragraph "A HQ greater than 1 does not indicate that adverse impacts will occur..." Insert does not necessarily indicate..."

Response: "Necessarily" was inserted as requested.